



Innovation in Acquisition: COMMITTS

by Ann Costello

The Department of Commerce's "COMMERce Information Technology Solutions" — better known as COMMITTS (pronounced "comets") — breaks new ground in acquisition methodology and embodies key principles of acquisition reform. As Vice President Al Gore characterized in his congratulatory letter to Secretary Daley (see the top of the next page), COMMITTS is "the first ever government-wide procurement initiative for small, women-owned, and minority-owned firms."

The purpose of this *Advisory* is to tell the story of COMMITTS: what it is, how it came about, what innovations it adopted, what services are available, how the ordering process works, what agencies should do to acquire services, and what lessons were learned. We at Acquisition Solutions are proud to tell the story, because we supported Commerce in this effort.

ABOUT COMMITTS IN GENERAL

What is COMMITTS?

COMMITTS is a multiple award, solutions-oriented Government-Wide Acquisition Contract (GWAC) designed to satisfy agency needs for information technology in the functional areas of Information Systems Engineering, Information Security, and Systems Operations and Management.

The government-wide COMMITTS program has three objectives:

- ◆ Provide top quality IT solutions to meet an organization's mission,
- ◆ Utilize a streamlined acquisition methodology, and
- ◆ Provide a talented pool of small, small disadvantaged, 8(a), and women-owned small business contractors capable of meeting federal agencies' IT requirements.

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The Vice President
Washington
July 9, 1999

The Honorable William M. Daley
U.S. Department of Commerce
14th and Constitution Ave. NW
Washington, DC 20230

Dear Secretary Daley,

I want to congratulate you on the successful launch of "COMMITTS," the first ever government-wide procurement initiative for small, women-owned, and minority-owned firms. This innovative program will help to channel more than \$1.5 billion in federal contracts to outstanding small, minority and women-owned firms in the information technology (IT) field.

As you know, one of the first tasks I undertook as Vice President was to streamline government to make it work better and cost less. The COMMITTS program truly embraces these principles. Although there are more than 25 government-wide agency contracts ("GWAC") now in use throughout government, COMMITTS is the first GWAC composed *exclusively* of small, minority, and women-owned IT firms. In particular, I commend your decision to choose the IT sector – which now represents the largest and fastest growing segment of government contracts. The firms represented in COMMITTS will be able to meet the government's growing need for IT services, IT systems and IT security solutions, while at the same time helping to distribute federal dollars more equitably.

We know that small business contributes over 60% of the new jobs in our economy. There are now more than 640,000 African-American businesses, 770,000 Hispanic-owned businesses, and overall some 30% of all firms are women-owned. A large percentage of these firms are involved with information technology. Your COMMITTS program helps us to support these companies, which are so vital to our thriving economy – and helps us to ensure that federal contracts are distributed more equitably.

Congratulations again on helping to reinvent the federal procurement system with this exciting and innovative program.

Sincerely,

Al Gore

How big is COMMITTS?

Very big. The Department of Commerce anticipates that IT expenditures under these multiple award contracts will cumulatively reach \$1.5 billion over five years. COMMITTS is a mandatory source for consideration by Commerce bureaus, which alone spend about \$300 million annually on IT.

Why should another Government agency use COMMITTS?

COMMITTS provides agencies with easy, streamlined access to 29 high-quality prime contractors. Each COMMITTS prime contractor has

demonstrated its commitment to quality through achievement of quality awards and certifications, such as the SBA Small Business Prime Contractor of the Year, Software Engineering Institute Capability Maturity Model, and ISO 9000. More important to some, agencies “take credit” for the award to a small business even though the task order is issued under the COMMITS contract.

Why was COMMITS established?

One critical reason for the establishment of COMMITS is the effect of acquisition reform on small businesses. Many IT requirements that traditionally were publicly announced are now being met through orders against existing task and delivery order contracts. Small businesses are simply not aware of these requirements and do not have the opportunity to market their capabilities and compete for these tasks. This trend has stifled the ability of small businesses to participate in the Federal IT marketplace and to develop the skills and experience to grow and mature.

The Small Business Administration (SBA) Office of Advocacy recently reported that in fiscal year 1998, small businesses were awarded less than 19 percent of the \$181.7 billion in prime contract awards (of over \$25,000), despite a government-wide goal currently at 23 percent. [See the April-May *Update* article, “Doing Business with Small Business.”] Further, Jere W. Glover, chief counsel of the SBA Office of Advocacy, has said that small business market share appears to be declining — roughly 10 percent from 1996 to 1998 — and that one reason for this may be Government-wide Acquisition Contracts (GWACs).

We believe this is true ... at least in the information technology marketplace. With the proliferation of GWACs and multiagency contracts (which are characteristically awarded to large businesses), small businesses are finding it difficult to identify opportunities to compete. Furthermore, from an agency’s perspective, in many respects *it is easier and less risky to place a million-dollar order with a large business GWAC contractor than it is to conduct a \$50,000 “simplified acquisition” competition*. This places small businesses at a disadvantage and hinders the efforts of agencies attempting to meet their small business goals.

COMMITS is designed to address this problem and to provide an efficient, effective, and economical means of performance-based, task-order contracting with high quality small business, small disadvantaged business, small disadvantaged 8(a) business, and woman-owned small business providers of information technology services. COMMITS was not structured as a socioeconomic program ... but as a means of tapping the nation’s top small business talent in the largest and fastest growing segment of government contracts: information technology.

In summation, COMMITS seeks to “level the playing field” with a small business GWAC that makes it as convenient to place an order with a high-quality small business as it currently is with a large. *The COMMITS*

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contracts are a means to acquire information technology services efficiently and effectively from outstanding small-business prime contractors. Tasks placed against the COMMITTS contracts help agencies across government achieve their small business program goals.

Why the Department of Commerce?

The Department of Commerce has, as an essential part of its mission, the objectives to support job creation and economic growth. Commerce used this as part of the business-case rationale, first to establish the COMMITTS acquisition program and then to seek designation from the Office of Federal Procurement Policy (OFPP) as “executive agent” for managing the COMMITTS GWAC. This approach reflects an important element of reform: the mandate to base acquisitions on critical agency mission and objectives.

Why another GWAC?

Although there are more than 25 GWACs now in use throughout the government, there were none (before COMMITTS) devoted exclusively to small businesses. COMMITTS is specifically designed to meet important agency and government-wide small business goals.

OFPP asked this very question, *why another GWAC*, in giving the Department of Commerce’s request for executive agent designation a close review. OFPP accepted Commerce’s rationale and OMB Director Jacob Lew designated Commerce as executive agent for the COMMITTS GWAC on June 21, 1999. This means that agencies ordering from COMMITTS need not complete an Economy Act determination.¹ (This is in contrast to multiagency contracts, which are government-wide ordering vehicles, but which lack OFPP executive agent designation.²)

ABOUT COMMERCE’S COMMITTS COMPETITION

What innovations were adopted in COMMITTS?

The chief innovations adopted in the COMMITTS acquisition fall into five categories:

- ♦ Short, to-the-point proposals,
- ♦ Unique past-performance evaluation,
- ♦ Streamlined evaluation using oral presentations,
- ♦ Solutions-based acquisition with performance-based task orders, and
- ♦ Program management for effective implementation.

What did COMMITTS require in terms of proposals?

Very little, but with an emphasis on the truly important. The primary criterion was past performance, with the objective of the initial COMMITTS

competition to pre-qualify the nation's top-ranked small businesses in the information technology sector. With such factors in mind, COMMITTS proposals were submitted as required in one-inch binders, organized and tabbed as followed—

- ♦ Tab A: Transmittal letter and SF-33.
- ♦ Tab B: Section K representations and certifications.
- ♦ Tab C: Description of labor categories with proposed labor rates.
- ♦ Tab D: Two-page executive summary, offeror composition form, oral past performance reference lists, and copy of oral presentation slides.
- ♦ Tab E: Quality recognition and certification profile form, quality recognition or certification documents and official criteria.

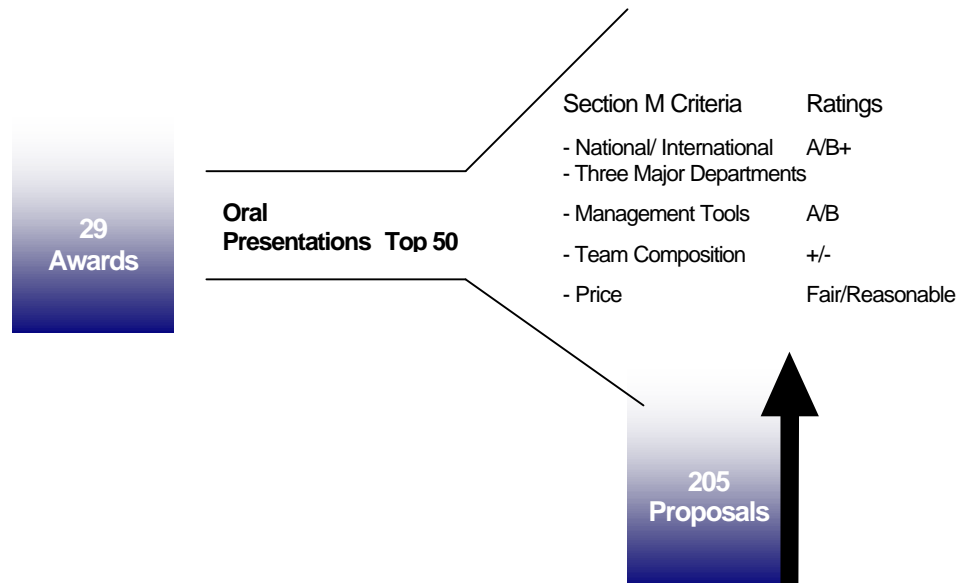
How did the COMMITTS acquisition address past performance?

In an innovative way. Rather than rely on the traditional survey-type past performance methodology — which has many weaknesses — COMMITTS evaluation criteria focussed on past performance by relying on specific indicators *of quality recognition and certifications*. By tiering these indicators into three levels — national and international recognition, state or agency recognition, and letters of commendation — *significant discrimination among offerors was possible, easing the evaluation process*.

By using specific indicators of quality and making past performance the principal selection factor, COMMITTS contractors are truly top ranked and eminently qualified. For example, numerous awardees are certified at International Standards Organization (ISO) 9000 and Software Engineering Institute (SEI) Capability Maturity Model (CMM) Level 2, with several nearing Level 3 certification. Among the awardees are, for example, the 1997 SBA Small Business Prime Contractor of the Year, the 1998 Small Business Partner of the Year at the Treasury Department, the 1997 Outstanding Native American Business of the Year, a Wharton School of Business 100 Awardee, and the Department of Commerce's National Minority Entrepreneur of the Year. Clearly, using past performance (based

By tiering these indicators into three levels, significant discrimination among offerors was possible, easing the evaluation process.

Non-Price Factor / Rating	A	B	C
Past Performance			
♦ Quality Recognition and Certifications			
♦ Past Performance			
Non-Price Factor / Rating	+		-
Team Composition			
Price Factors			
Realism			
Reasonableness			



Source: Based on an illustration in the COMMITS "Summary of Selection"

... the evaluation criteria in Section M were extremely simple and straightforward.

on quality recognition and certification) as the principal selection factor was very effective in identifying firms representing some of the best small business IT talent in the nation.

What was unique about the COMMITS evaluation?

First, the evaluation criteria in Section M were extremely simple and straightforward. There were only two non-price factors, two non-price subfactors, and two price factors. Further, each non-price factor had only two or three levels of rating which, as implemented, were minimally subjective.

Of the non-price factors, past performance was significantly more important than team composition. Each non-price factor was more important than price. Together the non-price factors were significantly more important than price.

Second, an initial rating of proposals selected out (for continued evaluation) the 50 highest rated proposals out of over 200 received. [Note: Twenty-nine were ultimately chosen for award — reflecting a high degree of selectivity, while still providing for effective task-order-level competition.] The Department of Commerce described the process in a "Summary of Selection" posted on its website—

As stated in the Request for Proposal (RFP), the Government intended to invite all offerors for oral presentations. We did however maintain the right to limit oral presentations to only those offerors that had a

reasonable chance for award. Before scheduling any oral presentations, the Government first performed an evaluation of the proposals against the criteria listed in Section M of the RFP. This initial evaluation identified the highest rated proposals with the greatest chance for award. Using the initial evaluation results, the Government began scheduling and conducting oral presentations.

Third, oral presentations were used simply to clarify and confirm proposal statements. As required by the Request for Proposals, competitors had included copies of oral presentation slides in the proposal. No additional material could be provided during the oral presentation, and any material provided in the proposal but not covered in the permitted one-hour time period was discarded. It was clear in the solicitation that such oral exchanges would not constitute discussions as defined by FAR Part 15.

The effect of this was a “funneled” acquisition, wherein all 205 timely proposals were evaluated against the Section M evaluation criteria. The top 50 proposals — a number which the Department believed “represented a sufficient number to ensure adequate competition for issuing task orders over the systems life” of this multiple award contract — were scheduled for oral presentations.

How does COMMITTS adopt a solutions-based approach?

Traditionally, Federal contracts are either classified as a service or supply contract. COMMITTS is “solution-based,” meaning it is a contract with a focus on providing *solutions*. During task order competitions over the life of the contract, COMMITTS contractors are free to provide whatever service or product is required to solve the problem as stated in the performance-based statement of requirement. While the term “solution-based” is frequently used, most solicitations and resultant contracts do not change the basic contract structure to reflect this new environment — that is, such contracts still require pre-determined fixed product and service contract line items. Because contractors under these contracts are limited to contract labor rates or products that they bid in the original competition, they are also limited in the solutions they can offer.

COMMITTS is one of the first true solution-based contracts. The awarded contracts do not contain product contract line items, and the contractors are not limited only to the contracts’ fixed labor categories and prices. In competing for task orders, COMMITTS contractors are free to propose the best “solution” to each requirement. COMMITTS contractors can use their unique creative and innovative ideas and they can scour the market for the optimum solution. For example, if the contractor believes a Nobel laureate is necessary to meet the requirement, they can propose that individual *at the market rate*. Also, the contractor can offer any product from any manufacturer that the contractor determines is necessary to best meet the requirement. (COMMITTS contractors will even be authorized, for example, to “use the FSS contracts to take advantage of the significant quantity discounts available to the Government.”) Note that what makes the

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solution-based approach possible in terms of sound acquisition is that the *fair opportunity task order process permits competition at the solution level.*

The COMMITTS solution-based approach frees both the contractors and government from the significant administrative burden of technology refreshment provisions and the constraints of unrealistically low labor rates. (Fixed rates in a tight labor market often leave critical positions unfilled.) And by maintaining a competitive environment throughout, COMMITTS offers the potential to achieve the best, most creative, and efficient solutions to the offered problems. In short, in responding to the government's requirements, the contractors can operate more commercially in a "real time," market-price-driven environment.

How will COMMITTS be managed for effective implementation?

The COMMITTS program management office will operate in a manner that supports ordering agencies and assures that all orders placed under the proposed contracts meet the requirements of law and regulation. This includes ensuring that proposed task orders have budgetary and internal agency approvals and that the competitive "fair opportunity" requirements of the FAR are met. This is absolutely essential for all players because of the solution-based contract structure and the intense scrutiny of oversight organizations on noncompetitive task order contracting.

Because the COMMITTS GWAC is intended to provide agencies a low risk alternative for placing task orders with small businesses, there are two key elements for success under this program. First, sound contracting practices must be provided by procurement professionals trained in managing this type of vehicle. Second, sound program management must be applied to all projects to ensure success. A key factor of both elements is a focus on performance-based acquisition.

There are special innovations in the program management approach as well. For example, Commerce will repeat the performance theme by partnering with the COMMITTS contractors in teams to develop ordering procedures, performance metrics, and website and marketing programs. The Department will also adopt balanced scorecard and metrics to measure program success. Finally, the COMMITTS program office will invite senior procurement and CIO executives from other government agencies to form a board of directors ... which promises to make COMMITTS a *true government-wide contract.*

ABOUT ORDERING FROM COMMITTS

What services are available through COMMITTS?

Under 29 indefinite-delivery, indefinite-quantity (IDIQ), multiple award, task order contracts, COMMITTS makes available information technology services in three functional areas:

- ♦ Information systems engineering
- ♦ Information systems security, and
- ♦ Systems operations and maintenance.

Each of the three functional areas is described in terms of multiple tasks. *Information systems engineering* (ISE) tasks can include (but are not limited to)—

- ♦ IT strategic planning, program assessment, and studies,
- ♦ Business process re-engineering,
- ♦ Software life cycle management,
- ♦ Software engineering,
- ♦ Software maintenance and licensing,
- ♦ Electronic data interchange (EDI) and electronic commerce (EC) support,
- ♦ Independent validation and verification support (related to ISE tasks), and
- ♦ IT research and development.

Information systems security (ISS) tasks can include (but are not limited to)—

- ♦ Mainframe automated information security support,
- ♦ Disaster recovery, continuity of operations, and contingency planning,
- ♦ Computer security awareness and training,
- ♦ Computer security incident response,
- ♦ Virus detection, elimination, and prevention,
- ♦ Computer security plan preparation,
- ♦ Certification of sensitive systems,
- ♦ Quantitative risk analysis of large sensitive systems,
- ♦ Security for small systems, telecommunications, and client server, and
- ♦ Independent validation and verification support (related to ISS tasks).

Systems operations and maintenance (SOM) tasks can include (but are not limited to)—

- ♦ Office automation support / help desk,
- ♦ Network support,
- ♦ Computer center technical support,
- ♦ Media / learning center support,
- ♦ Telecommunications support,
- ♦ Seat management, and
- ♦ Independent validation and verification support (related to SOM tasks).

A summary of contractor participation in each functional area appears in the table at the top of the next page.

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Ordering from COMMITTS offers all the “usual” advantages of ordering from a GWAC plus some.

Functional Area	Participating	Business Type			
		S	SDB	8(a)	WOSB
Information Systems Engineering	22	5	4	9	4
Information System Security	8	N/A	N/A	6	2
Systems Operations & Management	16	1	3	9	3

Key: S = small businesses; SDB = small disadvantaged businesses; 8(a) = SBA-designated small businesses under the section 8(a) Business Development program; and WOSB = woman-owned small businesses.

What advantages are there for agencies ordering from COMMITTS?

Ordering from COMMITTS offers all the “usual” advantages of ordering from a GWAC *plus some*. These advantages include:

- ♦ Broad flexibility under the fair-opportunity competitive process, including “best value” source selection decisions focused on contractor-provided, performance-based proposals.
- ♦ Sizable, pre-qualified pool of “award winning” contractors.
- ♦ Streamlined fair-opportunity task order competitions that allow the ordering agency to review a variety of competitive solutions, approaches, and prices from COMMITTS’ highly qualified contractors.
- ♦ Constant past-performance incentive, because fair-opportunity selection criteria require review of previous task-order performance.
- ♦ Limited grounds for protest (by statute) under a fair-opportunity competition.
- ♦ Support for ordering agencies from COMMITTS program office at a flexible (and lower) fee structure than most other GWACs.
- ♦ True solutions-based contract, in that the contractor is not restricted to predetermined products or labor categories.

- ♦ Credit toward meeting the ordering agency's socio-economic contracting goals.

Note also that *COMMITTS contractors have been pre-qualified using a higher past-performance standard than any other GWAC*. No such acquisition to date has placed the same degree of emphasis and specificity on past performance. Note also that the firms that won are highly specialized IT support businesses, not body shops.

How does the COMMITTS ordering process work?

In general, the COMMITTS fair-opportunity procedures for the task order level require the agency to develop a statement of objectives, source selection criteria, and (with the assistance of the COMMITTS program office) a task order management plan. Agencies are encouraged to conduct extensive market research.³ This may include contacting COMMITTS contractors; however, they may not prepare the statement of objectives. It is important that this document (the basic requirement) be prepared by the agency ... and that it be prepared in terms of performance or outcomes so that the contractors' creativity can be tapped at the proposal level. By this means, the agency can—

- ♦ Evaluate each competing contractor in terms of (1) understanding the problem and (2) approach to resolution,
- ♦ Compare the similarities and (more importantly) the differences among the proposals, and
- ♦ Make a best value selection.

More specifically, there are two types of ordering processes, depending upon the extent and specificity to which the agency has detailed its requirements: (1) standard ordering process and (2) fast track ordering process. Both types are web-based processes and have three key features: acquisition planning, screening of vendors and awarding task orders, and managing for results.

The *standard ordering process* allows the customer first to issue a "high-level" statement of need (a Project Agreement) to COMMITTS contractors that describes, in general terms, the agency's IT service or project. COMMITTS contractors then respond to the Project Agreement with high-level proposals that outline their proposed solutions and provide high-level price estimates for the acquisition.

Based on the information provided in the high-level proposal and evaluation criteria stated in the Project Agreement, a downselection is made and the most qualified contractors continue to participate in the remaining phases of the task order competition. At this point, the requiring agency is encouraged to work closely with the selected contractors to identify the requirement in more detail and to perform due diligence. This helps

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agencies understand and meaningfully assess contractors' varying approaches to solving agency problems. Full and open exchanges between the user and the downselected contractors ensure that all fully understand and best compete to provide the solution to the "real" requirement.

The contractors then prepare a performance-based statement of work and identify the performance measures based on their solution. (That's right ... the contractor prepares the performance-based statement of work and identifies the performance measures!) The customer then selects the winning contractor based on the best-value assessment of the performance-based statement of work, the performance measures, and the price.

The second process, the *fast track ordering process*, is appropriate for agencies that already have well defined requirements and performance-based work statements. This acquisition model combines elements of the standard ordering process into one document — the Fast-track Request for Solutions (FRFS). The FRFS is posted on the COMMITS Acquisition and Business Opportunity Website, proposals are received, negotiations are conducted, and the contractor's proposal that provides the best-value solution for the customer is selected for task order award.

Further information about these processes is in the COMMITS Program Management Ordering Guide which is available on the COMMITS website at <http://www.commits.doc.gov/>.

ABOUT LESSONS LEARNED ... AND CONCLUSION

What were the lessons learned in COMMITS?

There were three primary lessons learned, two closely related. As Commerce reported (in advance of debriefings) in the "Summary of Selection" posted on the COMMITS website—

Through post award discussions with COMMITS offerors, it became clear that there was considerable confusion and misunderstanding regarding the scheduling and application of oral presentations to the COMMITS selection process. Through these discussions we [learned] that many offerors believed the oral presentations were "scored" and became a part of the decision process. We have also heard that offerors believed that the presentation was an opportunity to provide information that was not in the original proposal. Offerors who were not scheduled to present oral presentations believed that their proposals were somehow incomplete as a result.

A significant number of the competing small businesses were unaware of the implications of some elements of the COMMITS strategy. Given the level of knowledge about acquisition reform in the small business community, agencies need to exert great care in informing the potential

offerors about the proposal evaluation process and the rules. For example, many vendors did not fully appreciate the difference between an evaluation factor and a mandatory requirement. Some competitors understood simply that having quality recognition and certifications was not a mandatory requirement and they could submit a proposal. Those competitors simply did not understand the importance of quality recognition and certifications to the selection decision. Consequently, many contractors submitted proposals when, given the qualifications of their competitors, they had no reasonable chance for award based on section M criteria.

The second (and related) lesson learned is to maintain open communications *throughout the process*. As Commerce noted in the Summary of Selection—

The COMMITS team ... took great pride in the open communication environment they fostered during the pre-proposal phase of the program. In retrospect however, we failed to continue that very important effort once proposals were received. As reported in the press, we did receive double the number of proposals anticipated which required many, many additional hours of evaluation by the source selection team. However, the fact remains, we could have done a better job keeping the offerors informed. Please accept our apology for not doing a better job informing you [of] our progress and scheduling methodologies.

The third lesson learned is that *considerable innovation is possible* within existing acquisition law, regulation, and policy ... allowing agencies to award contracts efficiently, effectively, economically, and innovatively in support of agency and government-wide missions.

Conclusion

The COMMITS acquisition is a groundbreaking acquisition, and not just in terms of its small business make-up. It was conducted expeditiously and efficiently: from final RFP release on March 5, 1999, to receipt of 205 timely proposals on March 26, to award announcements on June 18, 1999. It was innovative and inexpensive. As Commerce indicated—

The Department took great pains to minimize costs from preparing proposals against this RFP. Two page proposal summaries and minimal documentation were requested for submission. Oral presentations were only requested from firms whose proposals indicated they had a reasonable chance for award. From both our internal analysis and comments received from both successful and unsuccessful offerors, COMMITS was one of the least expensive full and open GWAC Information Technology competitions ever conducted.

...
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The most highly ranked, IT-proficient small businesses in the nation are open for business under COMMITS.

The COMMITS contracts are now available to assist agencies, not just to meet small business goals, but also to meet mission-critical information technology needs. The most highly ranked, IT-proficient small businesses in the nation are open for business under COMMITS. ♦

For further information:

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<http://www.commits.doc.gov/>

¹ See the November 1997 *Advisory*, "Economy Act Procedures."

² Note that most GWACs in existence to date were authorized by the General Services Administration under "Brooks Act" delegations of procurement authority. OFPP now has the sole authority to designate agencies to manage GWACs ... and is choosing to do so quite selectively and placing important responsibilities on the executive agents. The only designations OFPP has made since 1997 are to the General Services Administration for contracts awarded by FTS, the Department of Transportation for the Information Technology Omnibus Procurement II (ITOP II), and the Department of Commerce for COMMITS. For more on GWACs and multiagency contracts, see most especially the February 1999 *Update* article, "OMB Embarks on GWAC Study," and the May 1998 *Advisory*, "Establishing and Using Task Order Contracts: Use Correctly or Lose."

³ See the COMMITS ordering procedures at <http://www.commits.doc.gov/> for some of the more innovative ways that COMMITS will improve on government-contractor communications.